

**ENTERED**

August 12, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

NEIMAN MARCUS GROUP LTD LLC, *et al.*,<sup>1</sup>  
  
Reorganized Debtors.

Chapter 11

Case No. 20-32519 (DRJ)  
(Jointly Administered)

MOHSIN MEGHJI, LIQUIDATING TRUSTEE,  
  
Plaintiff,

Adv. Pro. No. 22-03216

v.

MYT HOLDING LLC, MYT ULTIMATE  
PARENT, INC., ARES CORPORATE  
OPPORTUNITIES FUND III, L.P., ARES  
CORPORATE OPPORTUNITIES FUND IV, L.P.,  
ARES MANAGEMENT LLC, CANADA  
PENSION PLAN INVESTMENT BOARD  
(USRE), INC., AND CEDE & CO.,  
  
Defendants.

**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME  
TO RESPOND TO LIQUIDATING TRUSTEE'S COMPLAINT  
FOR DECLARATORY RELIEF (Docket No. 13)**

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Reorganized Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201. On March 31, 2021, the Bankruptcy Court entered an ordered closing each of the chapter 11 cases of Neiman Marcus Group LTD LLC's affiliates, with the chapter 11 case of Neiman Marcus Group LTD LLC remaining open as the lead case [Docket No. 2371].

Plaintiff Mohsin Meghji in his capacity as trustee (the “Liquidating Trustee”) for the Liquidating GUC Trust and defendants MYT Holding LLC, MYT Ultimate Parent, Inc., Ares Corporate Opportunities Fund III, L.P., Ares Corporate Opportunities Fund IV, L.P., Ares Management LLC, and Canada Pension Plan Investment Board (USRE), Inc. (the “Stipulating Defendants”) in the above-captioned adversary proceeding, by and through their respective undersigned counsel, hereby stipulate, subject to the Court’s approval, as follows:

1. The Liquidating Trustee filed its Complaint for Declaratory Relief against the Stipulating Defendants on July 11, 2022 (Docket No. 1) (the “Complaint”).<sup>2</sup>

2. The summonses to the Stipulating Defendants were issued on July 12, 2022 (*see* Docket No. 4).

3. The deadline for the Stipulating Defendants to answer or otherwise respond to the Liquidating Trustee’s Complaint, presently set for August 11, 2022, is hereby extended to August 25, 2022.

4. If a Stipulating Defendant files a motion to dismiss, the Liquidating Trustee shall have 21 days from the date of such motion to file an opposition thereto and the Stipulating Defendant shall have 7 days from the date of such opposition to file a reply, if any.

5. This Stipulation does not constitute a waiver of claims or defenses by any party.

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<sup>2</sup> The remaining defendant, Cede & Co., has advised that it disputes service and is thus not party to this stipulation.

Dated: August 5, 2022

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*Counsel for Defendant Canada Pension Plan  
Investment Board (USRE) Inc.*

**SO ORDERED** this \_\_\_\_\_ day of August, 2022.

**Signed: August 11, 2022.**

  
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**DAVID R. JONES**  
**UNITED STATES BANKRUPTCY JUDGE**